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July 9, 2021

VIA ECF

United States District Court
Eastern District of New York
Attn: Hon. Taryn A. Merkl, U.S.M.J.
225 Cadman Plaza East, Room 322N
Brooklyn, NY 11201-1804

Re: Star Auto Sales of Bayside, Inc., et al. v. Voynow, Bayard, Whyte and Co., LLP, et al.
Case No.: 1:18-cv-5775 (ERK) (CLP)
Defendants' File No.: 03127-1373
MLLG File No.: 76-2018

Dear Judge Merkl:

This office represents the Plaintiffs in the above-referenced case. Plaintiffs write to respectfully request a one (1) week extension of time of today's deadline to submit: (i) their supplemental letter as to continued areas of disagreement and in further support of their positions related to their letter motions to quash a subpoena (Docket Entry 51) and for a protective Order (Docket Entry 54); and (ii) the parties' case management worksheet. See Docket Entry 58.

The reason for the request is there has been a death in the family of Michael Koufakis, the Plaintiffs' principal. Specifically, Mr. Koufakis' father passed away, and the Plaintiffs need additional time to complete their supplemental letter due to Mr. Koufakis' extensive involvement in preparing the supplemental letter and to permit time for Mr. Koufakis and his family to pay their respects. Further, Jeremy Koufakis, who is heavily involved as counsel in this case, is also grieving the passing of his grandfather and similarly needs additional time to work on the supplemental letter and the case management worksheet.

Rule 6 of the Federal Rules of Civil Procedure (hereinafter referred to as "Rules" or "Rule") provides that the standard under which a motion for extension of time is decided is whether good cause exists for the Court to exercise its discretion in favor of granting the request. See Fed. R. Civ. P. 6(b)(1)(A). Here, Plaintiffs respectfully submit that the circumstances giving rise to the need for an extension readily meet this standard. Further, Defendants have no objection to the requested extension.

Accordingly, Plaintiffs respectfully submit that good cause exists warranting this Court's exercise in favor of granting the brief extension requested.

Dated: Lake Success, New York
July 9, 2021

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Enclosure.

VIA ECF

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